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11 *Attorneys for Defendants*
12 *Desert Ready Mix, LLC and Jim Chico*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

18 FERNANDO MADERA,
19 Plaintiff,
20 vs.
21 DESERT READY MIX, LLC., a Nevada limited
22 liability corporation; JIM CHICO,
23 Defendants.

24 Case No.: 3:22-cv-00255-RCJ-CLB

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STIPULATION AND ORDER TO EXTEND
DEFENDANT'S DEADLINE TO
FILE RESPONSIVE PLEADING
(Second Request)

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28 Defendant Desert Ready Mix, LLC and Jim Chico (collectively referred to as
"Defendants"), by and through their counsel of record, ANTHONY HALL and JONATHAN
McGUIRE of SIMONS HALL JOHNSTON, and Plaintiff FERNANDO MADERA, ("Plaintiff")
by and through his counsel of record, ALEXANDER CHERUP and DAVID OLSHAN of
NEVADA LEGAL SERVICES, INC. hereby stipulate and agree to extend the deadline for
Defendants to file their responsive pleading. The response, currently due on July 21, 2022, will be
extended by one (1) week to and including **July 28, 2022**.

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1 This is the parties second request for an extension for Defendants to respond to Plaintiff's
2 Complaint and is made in good faith and not for the purpose of delay. Counsel for Defendants has
3 unexpectedly been required to oppose a petition for injunctive relief brought pursuant to 29 U.S.C.
4 §160(j) on a motion to expedite, which has prevented counsel for Defendants from dedicating the
5 time required to a responsive pleading in this case.

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8 DATED: July 19th, 2022

9 NEVADA LEGAL SERVICES, INC.

DATED: July 19th, 2022

SIMONS HALL JOHNSTON PC

10
11 /s/ David Olshan _____
12 Alexander Cherup, Esq.
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18 /s/ Jonathan A. McGuire _____
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25 Attorneys for Defendant

26 **ORDER**

27 IT IS SO ORDERED.

28 Dated: July 20, 2022

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